

RICHARD E. ZUCKERMAN
Principal Deputy Assistant Attorney General

AMY MATCHISON (CABN 217022)

Trial Attorney, Tax Division
United States Department of Justice
P.O. Box 683, Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 307-6422
Facsimile: (202) 307-0054
Email: Amy.T.Matchison@usdoj.gov
Western.Taxcivil@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

REZA RAE POURIAN,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 3:18-cv-04536-RS

ORDER STIPULATED

DISMISSAL

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiff Reza Rae Pourian and Defendant the United States of America, through their respective undersigned counsel of record, hereby jointly file this stipulation of dismissal. The parties have resolved their dispute as a result of the United States' concession that Plaintiff is entitled to the claimed refund and Plaintiff agreeing that the recharacterization of the payment from Plastikon from taxable to a tax-free return of capital permanently reduces his adjusted basis in his interest in Plastikon. There being nothing further for this Court to do, the parties request the Court dismiss this action with prejudice, with each side to bear its own costs and fees, including any attorney fees.

1 Dated this 12th day of November, 2020

2 RICHARD E. ZUCKERMAN
3 Principal Deputy Assistant Attorney General

4 /s/ Amy Matchison
5 AMY MATCHISON (CA SBN 217022)
6 Trial Attorney, Tax Division
7 United States Department of Justice
8 *Attorneys for UNITED STATES OF AMERICA*

9 Dated this 12th day of November, 2020

10 BAKER BOTTS LLP

11 By: /s/ Jon Feldhammer
12 JON FELDHAMMER
13 101 California, Suite 3600
14 San Francisco, California 94111
15 jon.feldhammer@bakerbotts.com

16 *Attorneys for REZA RAE POURIAN*

IT IS SO ORDERED.

Dated this 12 day of November, 2020



RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE